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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, DC 20544

In the Matter of

Replacement of Part 90
by Part 88 to Revise
the Private Land Mobile
Radio Services and Modify
the Policies Governing them.

PR Docket 92-235

To: The Commission

COMMENTS

_____ submits its comments
in response to the Commission's notice of Proposed Rule Making in this
proceeding, concerning:

1. Power Restrictions on Fixed Stations at Higher Elevations.
2. Channel Splitting.
3. Frequency Stability.
4. Consolidation of Private Land Mobile Radio Services.

Complete comments are provided on the following page.

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ENCLOSURE

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FCC 92-469

In the Matter of)
)
Replacement of Part 90 by Part 88 to) PR Docket No. 92-235
Revise the Private Land Mobile Radio)
Services and Modify the Policies)
Governing Them)
)

NOTICE OF PROPOSED RULE MAKING

Adopted: October 8, 1992

Released: November 6, 1992

Comment Date: February 26, 1993

Reply Comment Date: April 14, 1993

By the Commission: Commissioner Barrett issuing a separate statement.

I. Introduction

1. On July 2, 1991, we released a Notice of Inquiry (Inquiry) to

scheme that increases channel capacity for PLMR users. We are also sensitive to the need for a reasonable transition period for users to convert their radio systems to newer, more spectrum efficient technologies. These proposals are complex and deserve the full time and attention of all interested parties. In sum, the Notice is a critical step in providing for the future communications needs of private land mobile radio users. We are, therefore,

1. Power Restrictions: This proposal, which would require licensees to reduce power depending on height above average terrain, is a two dimensional solution to a three dimensional problem that will not work and that we strongly oppose.

In most cases, high elevation transmitter sites are surrounded by natural obstacles such as other mountains. Environmental, economic and zoning concerns often prohibit use of the best transmitter. Consequently, many transmitters are

equipment, which is single side band (SSB), is unacceptable to most users because of its poor audio quality. Moreover, this equipment has not been proven on a large scale as no licenses have been issued on the 220 band. Although long available for the 150 band, it has not gained wide-spread acceptance due to poor voice quality. The cellular telephone industry is now testing both digital and analog time-division equipment in an effort to develop standards for narrow band transmission. Reports indicate that those systems that have been installed are providing less than satisfactory results.

We oppose implementation of channel spacings of 5 and 6.25 khz on the 150 to 512 bands until: such standards have been proven on the 220 band; an industry consensus has emerged for technology that meets these standards; and, manufacturers have proven equipment ready to be marketed.

3. Frequency Stability: The FCC's proposal, which would tighten frequency stability to one part per million (PPM) on mobile units, serves no useful purpose. The difference in performance from existing equipment, particularly in the 150 to 174 mega-hertz band will not be apparent. No commonly available test equipment is capable of accurately measuring compliance with the fixed station standard of 0.1 ppm. We oppose this proposal as it will only serve to make obsolete all existing radios and to make new radios far more expensive.

4. Frequency Coordination: The Commission's proposal, which would cut the number of coordinators from 19 to three, would wreak havoc on the frequency coordination system. The current system, which developed over many years, is generally accepted as fair and efficient. It permits various industries as well as state and local governments to have reasonable assurance that they will be able to obtain a frequency when needed and have a voice in the rule-making process.

To take this system, which works well, and scrap it in favor of one in which three groups would exert dictatorial power from centralized locations over the nation's use of private radio frequencies is to invite inefficiency, conflict and abuse of power. In particular, industrial and commercial users of two-way radios would be at a disadvantage in the proposal as they would all be placed in a single pool for frequency coordination and might not be able to obtain frequencies when needed.

Although the current rules provide for licensing of cooperatives, this will be eliminated under the new proposal. These co-ops add efficiency to the licensing and coordination process. The presence of a *de facto* coordinator on the scene ensures that frequency utilization within the spectrum licensed to the co-op is optimized. Elimination of this provision of the rules will lead to major problems for many small-scale users. Although there are some problems with the current coordination system, we oppose these changes as we believe this proposal will make coordination problems much more difficult for two way-radio users.

Respectfully submitted,

